

EPA's Letter
Viorica Petriman

to:

akenney

07/17/2012 11:21 AM

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From: Viorica Petriman/R2/USEPA/US

To: akenney@dwwind.com,

1 Attachment



GSOE - OCS - Letter signed June 4 2012.doc.pdf

Aileen:

I am attaching the letter that was sent to Todd Tamura on June 4, 2012.

Viorica



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 04 2012

Todd Tamura, QEP
Consulting Engineer
160 Federal Street, 3rd Floor
Boston, MA 02110

Subject: Update Regarding Garden State Offshore Energy, LLC (GSOE) Meteorological
Buoy Deployment

Dear Mr. Tamura:

This is in response to your letter dated April 25, 2012, requesting confirmation that the U.S. Environmental Protection Agency's Region 2 Office (EPA) determination that no Outer Continental Shelf (OCS) source air permit was required for the GSOE's SeaZephIRTTM (SZ) Meteorological Station Project (buoy project), for which an OCS source air permit application was submitted to EPA on October 1, 2010 (2010 application), is likewise applicable to the new design of the buoy project.

As stated in your letter, the buoy project has been modified from its 2010 design (that proposed the use of a single clump weight) to include a larger mooring, comprising of a gravity base of three stacked, reinforced concrete slabs. Also, your letter lists the following changes associated with the revised buoy project: (1) increasing the size of the tug's propulsion engine from 600 brake horsepower hour (BHP) (as proposed in the 2010 application) to 1200 BHP; (2) increasing the size of the crane's engine from 425 BHP (as proposed in the 2010 application) to 600 BHP; and (3) increasing the estimated annual NO_x emissions resulting from the construction and decommissioning phase of the revised buoy project, by 1 ton per year per each phase.

The EPA's determination that no OCS source air permit was required for the 2010 buoy project was based on the buoy project's design specifications as they were presented in the 2010 application, and set out in EPA's October 15, 2010 letter. Based on the information presented in your letter it seems that the revised buoy project will have low level of emissions rates, the construction and decommissioning phases will take 2 days each, and the buoy by itself, once constructed, will result in no emissions.

However, the letter contains no information to confirm whether the other design specifications of the 2010 buoy project will be met. These design specifications include: (1) the construction equipment and engines located on board of the work barges meet all the conditions described in the NJDEP Memorandum called "Air Quality Permit Applicability at Construction Sites", issued on January 6, 2010; (2) the tug will not be equipped with construction equipment and no construction activities will be conducted direct from the tug, while the tug will be attached to the seafloor; (3) the crew boat will not be equipped with construction equipment, and no repairs or maintenance activities will be conducted direct from the crew boat, while the crew boat will be attached to either the seafloor or to the buoy; and (4) the buoy project's engines to which the applicable provisions of the New Source Performance Standards

Subpart IIII, and the National Emissions Standards for Hazardous Air Pollutants Subpart ZZZZ may apply, would meet these standards' requirements.

In conclusion, please be advised that EPA agrees that no OCS source air permit is required for the revised buoy project, providing that all the design specifications of the 2010 buoy project are met.

If you have any questions regarding this letter, please feel free to contact me at 212-637-4074, or to call Ms.Viorica Petriman at 212-637-4021.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Riva".

Steven Riva, Chief
Permitting Section
Air Programs Branch

cc: Aileen Kenney, GSOE (e-mail)
Francis Steitz, Assistant Director
New Jersey Department of Environmental Protection
Division of Air Quality (e-mail)